

**FILED**

JUN 29 2022 *ch*

RICHARD A. ETHERIDGE

Plaintiff(s),

v.

MIDLAND PAPER  
SUPPLIES + PACKING COMPANY

Defendant(s).

Case No. **1:22-cv-03401**  
**Judge Sharon Johnson Coleman**  
**Magistrate Judge Gabriel A. Fuentes**  
**RANDOM**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

5. The plaintiff [*check one box*]

- (a) ☒ was denied employment by the defendant.
- (b) ☐ was hired and is still employed by the defendant.
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) Feb., (day) 1, (year) 2018.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

- (a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☐ has ☒ has not filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☐ the United States Equal Employment Opportunity Commission, on or about (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.
- (ii) ☒ the Illinois Department of Human Rights, on or about (month) 11 (day) 7 (year) 2017.

- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ Yes, ☐ No, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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defendant asserting the acts of discrimination indicated in this court complaint.

☒ Yes (month) 2 (day) 1 (year) 2018

☒ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month) 11  
(day) 7 (year) 2018.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☒ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ Yes ☐ No, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on  
(month) April (day) 12 (year) 2022 a copy of which  
*Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a) ☒ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- (c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☒ failed to hire the plaintiff.
- (b) ☒ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): RELATION

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

✓ Copy of my Driver License  
✓ CACASUM - WHITE  
✓ prescription drugs  
✓ proof of Age

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ Yes ☐ No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff **[check only those that apply]**

- (a) ☒ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☒ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): Age And Relation  
By Management  
Disabilities - Taking Medications

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

Wrongful Termination By Milled Paper

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☐ Grant such other relief as the Court may find appropriate.

Richard A. Etheridge  
(Plaintiff's signature)

Richard A. Etheridge  
(Plaintiff's name)

2828 North Sacramento Ave  
(Plaintiff's street address)

(City) Chicago (State) Illinois (ZIP) 60618

(Plaintiff's telephone number) 773-772-9340

Cell Phone 773-661-8456

Date: 6-29-2022

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]





## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Chicago District Office  
230 S. Dearborn Street  
Chicago, Illinois 60604  
(800) 669-4000  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 04/12/2022

To: Richard A. Etheridge  
2828 N. Sacramento Avenue  
Chicago, IL 60618

Charge No: 21B-2019-00174

EEOC Representative and email:

Sherice Galloway  
Acting Coordinator / State, Local & Tribal  
[sherice.galloway@eeoc.gov](mailto:sherice.galloway@eeoc.gov)

### DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated your charge.

### NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 21B-2019-00174.

On Behalf of the Commission:

Digitally Signed By: Julianne Bowman  
04/12/2022

Julianne Bowman  
District Director

Cc: AMY QUESTIONS PHONE NUMBER 1-773-772-9380  
I WILL FILE A LAW SUIT AGAINST  
MIDLAND PAPER JIM EVANS FOR DISCRIMINATION  
Richard Etheridge  
(6-24-2022)

MIDLAND PAPER PACKAGING & SUPPLIES  
c/o Sarah E. Arbogast, Esq.  
Winston & Strawn, LLP  
35 W. Wacker Drive  
Chicago, IL 60601

1-312-558-5600

9:00 AM - 7:00 PM  
(Monday Thru Friday)

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

# 19W1101.10

**AGENCY**☒ IDHR☐ EEOC**CHARGE NUMBER**

2019CA0688

**Illinois Department of Human Rights and EEOC**

NAME OF COMPLAINANT (indicate Mr. Ms. Mrs.)

Richard A. Etheridge

TELEPHONE NUMBER (include area code)

(773) 772-9340

STREET ADDRESS

2828 N. Sacramento Avenue

CITY, STATE AND ZIP CODE

Chicago, Illinois 60618

DATE OF BIRTH

12/12/1959

MM / DD / YYYY

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)

NAME OF RESPONDENT

Midland Paper Packaging &amp; Supplies

NUMBER OF  
EMPLOYEES,  
MEMBERS 15+

TELEPHONE NUMBER (include area

(847) 777-2700

STREET ADDRESS

101 E. Palatine Road

CITY, STATE AND ZIP CODE

Wheeling, Illinois 60090

COUNTY

Cook

CAUSE OF DISCRIMINATION BASED ON:

Age Race Retaliation

DATE OF DISCRIMINATION

EARLIEST (ADEA/EPA) LATEST (ALL)

2/1/18

5/18/18

☐ CONTINUING ACTION

THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:

SEE ATTACHED

CAROL SALA  
1-312-714-4674  
Attorney

~~312-714-6250~~  
~~312-714-6250~~  
~~(THOMAS FARRER)~~

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MFP

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 7th DAY OF November, 2018

X

NOTARY SIGNATURE

*Kelly Ortiz*



NOTARY STAMP

X

SIGNATURE OF COMPLAINANT

DATE

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief